

Fischer, Bernice  
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Thomas Grim, Document Manager  
US Department of Energy/National Nuclear Security Administration  
Livermore Site Office, L-293  
7000 East Avenue  
Livermore, CA 94550-9234

April 25, 2004

Dear Mr. Grim:

- 1/04.01 We are unalterably opposed to the proposed plan to double the plutonium at the LLNL and to producing plutonium pits for nuclear weapons.
- 2/23.02 • Aside from the fact that this plan would increase the already evident risk to workers and the public of toxic and radiation disease, it is unconscionable to think that our government is also putting into jeopardy the Non-Proliferation Treaty by continuing to ignore our promise to disarm and work for elimination of all nuclear weapons.
- 3/01.01 We urge you to convey to our Government our deep concern. The opinion given by the International Word Court that "nuclear weapons are illegal" makes each of us culpable for being in violation and subject to criminal prosecution by world opinion.

Respectfully yours,

*Bernice Fischer*  
Dr. and Mrs. A. A. Fischer  
948 Altos Oaks Drive  
Los Altos, CA 94024

Fisher, Helen M.  
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May 26, 2004

Mr. Thomas Grim, L-293  
U.S. Department of Energy  
National Nuclear Security Administration  
Livermore Site Office, SWEIS Document Manager  
7000 East Avenue  
Livermore, CA 94550-9234

RE: Comments on the Department of Energy's Site-Wide Environmental Impact Statement (SWEIS) for Continued Operations at Lawrence Livermore National Laboratory (LLNL)

Dear Mr. Grim:

- 1/04.01 I have grave concerns as to why our government believes that our country needs bigger and better bombs and biological weapons when our stockpile of "weapons of mass destruction" is already overwhelming and a threat to all mankind.
- 2/27.01 It makes no sense to revive the Plutonium - Atomic Vapor Laser Isotope Separation project (AVLIS), cancelled ten years ago because it was dangerous and unnecessary. Renaming it the "Integrated Technology Project" (ITP) and the "Advanced Materials Program" (AMP) does not change that fact. It isn't logical to revive a project that has the potential to turn into a nuclear proliferation nightmare on a world-wide scale as other countries do the same in order to *keep-up-with-us* in nuclear capability, especially now that the Bush Administration has set a precedent for preemptive war.
- 3/24.02 Also of grave concern is that the Lawrence Livermore National Laboratory has caused enough environmental damage to be listed as a Superfund cleanup site, a situation that will only increase with the experiments planned with this program. LLNL has had its share of security problems in the past, for example, failing to change locks after losing track of keys, and failing to adequately secure gates and buildings, an open-door policy that is not acceptable.
- 4/30.02
- 5/01.01 The United States of America should be a leader among nations in finding ways to prevent war and the buildup of "weapons of mass destruction," rather than a leader in increasing both.

Yours truly,  
Helen M. Fisher

*Helen M. Fisher*  
2714 NW Pickett CT  
Bend, OR 97701  
Hfisher41@aol.com

FitzmaurIEL, Anne  
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Forrest, Elizabeth  
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April 25, 2004  
Dear Mr. Grim:

I strongly oppose DOE's Site-wide Environmental Impact Statement for Livermore Lab for the next ten years.

1/04.01 The amount of plutonium allowed must be decreased, not increased. In addition, new technologies threaten those at us living in the Bay Area. And underground testing must not be resumed.

Sincerely  
Anne FitzmaurIEL



Draft Site-wide Environmental Impact Statement  
for Continued Operation of Lawrence Livermore  
National Laboratory and Supplemental Stockpile  
Stewardship and Management Programmatic  
Environmental Impact Statement  
U.S. Department of Energy  
National Nuclear Security Administration



### Written Comment Form

Must be received on or before May 27, 2004.

Dear whom it may concern,  
1/33.01 I don't think you should triple the amount of  
plutonium. You shouldn't because if you do, what if there is  
a spill, or an explosion. If it is a spill, what if you can't  
2/25.05 lock up quick enough, and if it is an explosion, many  
people will die. We should not even make so many  
nuclear bombs. We should not use them because we  
3/32.02 want to. We can only use them to defend ourselves,  
but we shouldn't do that either. I don't want to  
have nuclear bombs, and that is that.

Sincerely,

Elizabeth (9 years  
Forrest old)

1028 Atherton Drive

Tracy, CA

95304

833-9171

Please use other side if more space is needed.

Comment forms may be mailed to:  
Mr. Tom Grim  
Document Manager  
National Nuclear Security Administration  
Livermore Site Office, L-293  
7000 East Avenue  
Livermore, CA 94550-9234

Comment forms may be faxed to:  
Mr. Tom Grim  
(925) 422-1776

Fountain, Aimee  
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Dear Mr. Grim:

1/04.01

I just wanted to take this opportunity to weigh in on the proposed expansion of nuclear work at the Lawrence Livermore National Lab. As a longtime resident of the bay area, I would be ashamed to have it be a site of renewing the policy of (unnecessary) live nuclear testing, a policy rightly abandoned in 1992. Besides it being a policy matter, the health risks of nuclear development in Berkeley are too great in such a location, due to the dense urban population as well as the situation of the lab between 2 earthquake fault lines. I oppose the DOE's proposed expansion of nuclear development. Thank you for your consideration.

Best,

Aimee Fountain

Fouts, Vickie  
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Dear Mr. Grim:

RE: Comments on the Department of Energy's Site-Wide Environmental Impact Statement (SWEIS) for Continued Operations at Lawrence Livermore National Laboratory (LLNL).

1/31.04

The nearly 200 members of the Fresno, CA Branch of the Women's International League for Peace and Freedom (WILPF) wish to express our deep concern with the health and environmental risks posed by the expanded nuclear weapons mission for the Lawrence Livermore National Laboratory (LLNL) into the indefinite future. We appreciate your focused attention to this matter. Below, we have outlined a number of specific concerns that, taken cumulatively, lead us to the conclusion that the Site Wide Environmental Impact Statement (SWEIS) for the continuing operation of LLNL is so deficient in information and analysis that it must be fixed and re-circulated in draft form. This would allow the community, the regulators, and the legislators to have the opportunity to evaluate the new information that is requested in these comments. Our specific concerns are:

2/08.02

1. The same day of the public hearings for the SWEIS, April 27, 2004, the Congressional Subcommittee on National Security, Emerging Threats, and International Relations for the Committee on Government Reform held a hearing on the security of nuclear materials. The hearing highlighted potentially insurmountable problems with plutonium and highly enriched uranium at certain Department of Energy (DOE) sites, with a focus on the vulnerability of nuclear materials storage at LLNL. On May 7, 2004, Energy Secretary Spencer Abraham delivered a speech on the deficiencies in the security of nuclear materials at LLNL and other DOE sites. The Energy Secretary made a commitment to consider removing the special nuclear materials at LLNL by 2005. This recent acknowledgement by the DOE that security at LLNL is questionable makes it imperative that the SWEIS evaluate an alternative that would remove all special nuclear materials from LLNL. These acknowledgements make this not only a reasonable option, but one that should be evaluated because it is a foreseeable outcome within the next decade at LLNL.

2. Instead of reducing the amount of special nuclear materials on-site at LLNL, this plan proposes to more than double the limit for plutonium at Livermore Lab from 1,540 pounds to 3,300 pounds. Additionally, under the Proposed Action, the administrative limit for highly enriched uranium in Building 239 would increase from 55 pounds to 110 pounds. Seven million people live in surrounding areas, and residences are built right up to the fence. Plutonium is difficult to store safely because, in certain forms, it can spontaneously ignite and burn. Moreover, it poses a criticality risk when significant quantities are stored in close proximity. The amount of plutonium proposed for LLNL is sufficient to make more than 300 nuclear bombs. Because of the health risks, the proliferation dangers, storage hazards, and very serious security concerns, we believe it is irresponsible to store plutonium, highly enriched uranium and tritium at LLNL. We are calling upon the DOE to de-inventory the plutonium, highly enriched uranium and tritium stocks at LLNL rather than to increase them.

Fouts, Vickie  
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3/34.01 4/33.01, 25.01	3. The SWEIS proposes to increase the at-risk limits for tritium ten fold, from just over 3 grams to 30 grams. The SWEIS proposes to increase the at-risk limit for plutonium from 44 pounds to 132 pounds. We believe it is unsafe to increase the amount of tritium and plutonium that can be "in process" in one room at one time. LLNL has a history of criticality violations with plutonium and releases of both tritium and plutonium, making it evident that these amounts should be decreased, rather than increased.
5/27.01	4. This plan will revive a project that was canceled more than 10 years ago because it was dangerous and unnecessary. The project was called Plutonium - Atomic Vapor Laser Isotope Separation (AVLIS). Now it is called the "Integrated Technology Project"(ITP) and the "Advanced Materials Program"(AMP). This is a scheme to heat and vaporize plutonium and then shoot multiple laser beams through the vapor to separate out plutonium isotopes. The ITP/AMP are a health risk and a nuclear proliferation nightmare. We believe the ITP and AMP work should be cancelled as the Plutonium AVLIS was cancelled in 1990 - this time permanently.
6/37.01	5. This plan makes Livermore Lab the place to test new manufacturing technologies for producing plutonium pits for nuclear weapons. A pit is the softball-sized piece of plutonium that sits inside a modern nuclear weapon and triggers its thermonuclear explosion. DOE says these new technologies will then be used in a new bomb factory, called the Modern Pit Facility (MPF). Public and Congressional opposition to the MPF has caused its delay this year. The Livermore Lab plutonium pit program goes full-speed ahead in the wrong direction. It will enable the MPF and production of 150 - 450 plutonium bomb cores annually, with the ability to run double shifts and produce 900 cores per year. This production capability would approximate the combined nuclear arsenals of France and China - each year. We call upon the DOE to halt all work on plutonium pit production technologies at Livermore Lab. We believe it is premature for the DOE to spend taxpayer dollars on this technology and the prudent and reasonable outcome is to delay or cancel this project.
7/26.01 8/26.03	6. This plan will add plutonium, highly-enriched uranium and large quantities of lithium hydride to experiments in the National Ignition Facility mega-laser when it is completed at Livermore Lab. Using these materials in the NIF will increase its usefulness for nuclear weapons development, including for the design of new types of nuclear weapons. It will also make the NIF more hazardous to workers and the environment. This is not only dangerous to people's health and safety, and a proliferation risk, but it is sure to result in an inordinate cost to the taxpayer. No cost estimate associated with this proposal has been released to date. We ask the DOE to cancel these dangerous, polluting, proliferation-provocative and unnecessary new experiments proposed for the NIF.
9/26.04	7. The SWEIS reveals plans to manufacture tritium targets at LLNL. The tritium-filled targets are the radioactive fuel pellets that the NIF's 192 laser beams will "shoot" in an attempt to create a thermonuclear explosion. Producing the targets will increase the amount of tritium that is used in any one room at Livermore Lab from the current limit of just over 3 grams to 30 grams - nearly 10-fold more. In the mid-1990's, LLNL stated that

Fouts, Vickie  
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9/26.04 cont.	target fabrication was to occur off-site because of LLNL's proximity to large populations. Livermore Lab has a history of tritium accidents, spills and releases. The NIF will increase the amount of airborne radioactivity emanating from LLNL. We call on DOE to cancel plans to manufacture tritium targets for NIF at Livermore Lab. Further, we urge cancellation of the NIF mega laser. Cancellation of NIF is a reasonable alternative that should be fully analyzed in the SWEIS.
10/39.01	8. This plan also calls for Livermore Lab to develop diagnostics to "enhance" the nation's readiness to conduct full-scale underground nuclear tests. This is a dangerous step back to the days of unrestrained nuclear testing. All work at LLNL to reduce the time it takes to conduct a full-scale underground nuclear test should be terminated immediately.
11/35.01	9. This plan mixes bugs and bombs at Livermore. It calls for collocating an advanced bio-warfare agent facility (BSL-3) with nuclear weapons activities in a classified area at Livermore Lab. The plan proposes genetic modification and aerosolization (spraying) with live anthrax, plague and other deadly pathogens. This could weaken the international biological weapons treaty -- and it poses a risk to workers, the public and the environment here in the Bay Area. The draft SWEIS does not adequately describe these programs, or the unique security, health and environmental hazards they present. Construction should be halted on the portable BSL-3 facility. All plans to conduct advanced bio-warfare agent (BSL-3) research on site at LLNL should be terminated.
12/14.01	10. There are 108 buildings identified at LLNL as having potential seismic deficiencies relative to current codes. The SWEIS should include a complete list of these buildings and an accounting of the ones that house or may house hazardous, radiological and biological research materials. LLNL is located within 1 kilometer of two significant earthquake faults, including the Las Positas Fault Zone less than 200 feet from the LLNL boundary. How can we mitigate harm done from an earthquake that damages these buildings before they are brought up to code? We urge the Livermore Lab to stop any work with hazardous, radioactive or biological substances that may be occurring in any building that does not comply with federal standards.
13/22.01	11. A contractor will be paid to package and ship more than 1,000 drums of transuranic and mixed transuranic waste to the WIPP dump in New Mexico, yet the SWEIS says this is exempt from environmental review. This work in its entirety must be included in the review.
14/20.05	12. The DOE does not acknowledge in the SWEIS that the double-walled shipping containers described in the document may be replaced by less health - protective single-lined containers. We believe that no waste should be shipped in single-walled containers and the SWEIS should provide a guarantee to that effect.
15/01.01	13. The Purpose and Need statement in the SWEIS relies heavily upon the US Nuclear Posture Review, which calls for an aggressive modernization and manufacturing base within the US nuclear weapons complex. This stands in stark contrast to the binding

**Fouts, Vickie****Page 4 of 4**

15/01.01  
cont.

legal mandate to shift "from developing and producing new weapons designs to dismantling obsolete weapons and maintaining a smaller weapons arsenal". We believe a revised Purpose and Need statement should accurately reflect the Livermore Lab's legal responsibility with regard to US law, including US obligations under the nuclear Non-Proliferation Treaty (NPT).

16/07.01

Further, the Purpose and Need statement in the SWEIS almost completely omits LLNL's important role in civilian science research. This omission fatally flaws the alternatives analysis in the SWEIS by neglecting to consider the expanded role that civilian science programs at the LLNL could play in the next decade.

17/02.01

The alternatives analysis should be revised to consider LLNL's role in light of the commitments in the NPT and the Livermore Lab's civilian science mission as well as the compelling case for removing special nuclear materials (i.e., plutonium and highly enriched Uranium) from the LLNL site.

Please do all you can to address the health and environmental risks posed by the expanded nuclear weapons mission for the Lawrence Livermore National Laboratory (LLNL). We would like to see the end of all nuclear weapons worldwide, but since that will not happen in the near future we ask that you do all you can to not allow the development of a whole new generation of nuclear bombs at LLNL and to find the best possible ways to deal with the waste already there.

In Peace,

Vickie Fouts  
WILPF Branch President  
PO Box 5114  
Fresno, CA 93755

cc: Senator Box, Senator Feinstein

Since 1915, WILPF has worked to achieve through peaceful means: world disarmament, full rights for women, racial and economic justice, an end to all forms of violence, and to establish those political, social, and psychological conditions which can assure peace, freedom, and justice for all.